IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

MICHAEL P. AND SHELLIE GILMOR,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:10-CV-00189-ODS
)	
PREFERRED CREDIT CORPORATION,)	
et al.,)	
)	
Defendants.)	

DEFENDANT BAC HOME LOAN SERVICING, L.P.'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO SERVE OBJECTIONS AND RESPONSES TO WRITTEN DISCOVERY

Defendant BAC Home Loan Servicing, L.P. ("BAC"), pursuant to Fed. R. Civ. P. 6(b), hereby moves for additional time in which to serve its responses to plaintiffs' fourth set of document requests. In support of its motion, defendant states as follows:

SUGGESTIONS IN SUPPORT

- 1. BAC was joined as a party in this case in 2011.
- 2. Plaintiffs served written discovery upon Countrywide on May 10, 2012.
- 3. BAC's responses to the plaintiffs' fourth set of discovery requests are currently due on June 13, 2012.
- 4. BAC needs an enlargement of time to serve its written responses. Plaintiffs' discovery is broad in scope, both in terms of its subject matter and time (by its instruction covering over ten years). BAC also needs additional time to complete its responses due to further investigation that is needed.
- 5. BAC requests that the Court grant it a fourteen-day enlargement and permit it to serve written responses (answers, responses and/or objections) by June 27, 2012.

- 6. BAC's counsel has discussed this motion for an enlargement of time with counsel for plaintiffs who have stated they have no objection.
- 7. This motion for an enlargement of time is made in good faith and not for the purpose of delay.
- 8. No prior requests for additional time have been made. BAC believes this motion for an enlargement of time will not unfairly prejudice plaintiffs or any other party to this action.

WHEREFORE, defendant BAC Home Loan Servicing, L.P. respectfully requests this Court to enlarge the time within which it may serve its discovery responses to and including June 27, 2012.

Respectfully submitted,

/s/ Mark A. Olthoff

MARK A. OLTHOFF
ANTHONY BONUCHI
MO #57838
POLSINELLI SHUGHART PC
1700 Twelve Wyandotte Plaza
120 West 12th Street
Kansas City, Missouri 64105-1929
(816) 421-3355
(816) 374-0509 (FAX)
molthoff@polsinelli.com
abonuchi@polsinelli.com

ATTORNEYS FOR BAC HOME LOAN SERVICING, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document was filed electronically with the above-captioned court, with notice of case activity to be generated and sent electronically by the Clerk of said court (with a copy to be mailed to any individuals who do not receive electronic notice from the Clerk) this 13th day of June, 2012, to all counsel of record.

/s/ Mark A. Olthoff

Attorney for BAC Home Loan Servicing, L.P.